

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

UNITED STATES EQUAL EMPLOYMENT )	CASE NO. 17-cv-01084-AJT-JFA
OPPORTUNITY COMMISSION, )	
Plaintiff, )	
)	
vs. )	
)	
CAMBER CORPORATION, )	
Defendant. )	
_____ )	

**UNOPPOSED MOTION TO EXCUSE LOCAL COUNSEL'S**  
**ATTENDANCE AT DISPOSITIVE MOTION HEARING**  
**AND WAIVER OF HEARING**

Pursuant to the Local Rules, EEOC files this unopposed motion to excuse EEOC's local counsel's attendance at the June 15<sup>th</sup> dispositive motion hearing and in support states:

1. Scheduled for hearing on June 15th, 2018 at 10:00 a.m. is Defendant's Motion for Summary Judgment (ECF 36). The undersigned EEOC Senior Trial Attorney, Jeffrey A. Stern, who has been admitted in this matter *pro hac vice*, is responsible for the content of the Commission's brief filed in opposition to Defendant's motion, and is knowledgeable as to all issues bearing on the motion and this litigation. Mr. Stern is the Commission's lead counsel in this matter.

2. The Commission acknowledges that its local counsel, David Staudt, is required to appear in person at all hearings, and Mr. Staudt is prepared to attend to hearing in person should the Court decline to grant this motion to excuse. However, given that EEOC's lead counsel, Jeffrey Stern, will handle the substance of the upcoming hearing, the Commission seeks the Court's permission to excuse its local counsel's attendance, thus avoiding the need for two Commission trial attorneys to travel to the Court and appear in person.

3. Of course, if the Court prefers that EEOC's local counsel attend the hearing in person the Commission will fully comply and, absent an order granting this motion to excuse, the Commission will have both its lead and local counsel attend.

4. L.R. 83.1(F) obliges an admitted attorney be personally present at all hearings, absent leave of Court. EEOC seeks leave of Court to excuse its local counsel's attendance pursuant to Rule 83.1(F).

5. EEOC has consulted with Defendant's counsel, who states that he does not oppose this motion and the relief sought.

6. EEOC seeks the above referenced relief in good faith, and not for any improper purpose.

7. Pursuant to the Local Rules governing matters pending in the Eastern District of Virginia, and in Alexandria, EEOC confirms that the parties waive hearing on this motion. Moreover, pursuant to the Rules a proposed Order is attached to this unopposed motion for entry.

Respectfully submitted,

/s/Jeffrey A. Stern

Senior Trial Attorney, admitted *pro hac vice*

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By:

/s/David Staudt

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 23<sup>rd</sup> day of May 2018, I filed the foregoing UNOPPOSED MOTION TO EXCUSE LOCAL COUNSEL'S ATTENDANCE AT DISPOSITIVE MOTION HEARING AND WAIVER OF HEARING with Proposed Order using the CM/ECF system, which will send a notification of such filing (NEF) to all ECF counsel of record in this matter.

s/David Staudt

David Staudt

Va. Bar ID # 47442

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